

Dragon, Karen E. (CDC/NIOSH/EID)

From: Randy Tomsa Avon-APS [randy.tomsa@avon-rubber.com]
Sent: Tuesday, September 06, 2005 2:36 PM
To: NIOSH Docket Office (CDC)
Cc: Jim Naylor - ATP; Mike Harral - ATP; Andy Capon - ATP; James Wilcox - ATP; David Overton - ATP
Subject: Reference NIOSH Docket Number 052

To whom it may concern,

After several inquiries over the last couple of months, to Ms Karen Dragon, we can no longer wait for the transcripts from the meetings to be published to submit our comments.

We therefore reserve the right to add, subtract or amend our formal comment(s).

Avon formally submits the following response to the draft CBRN user's guide. Avon's format to their comments references the page number as well as clause/ paragraph by numerical or alpha-numerical indication.

Please see below Avon's comments:

DRAFT CBRN USER GUIDE

P 17 "HH"

The final sentence is not clear or does not have much usefulness unless more information is given (or at least a link to a related web site) on how to use detection and monitoring systems to help determine canister replacement schedules.

P19 3e

It would be helpful to explain why canister black covers might be used (is it covert operations?)

P21 4 4th paragraph

This paragraph is confusing in that it does not make any discernable link between the lab tests and actual lifetime. It would be useful to link the paragraph to those parts of the document that discuss canister replacement schedules.

P22 5 selection logic.

Currently only cap 1 canisters are certified and there should be a note added to indicate that this section explains what will happen when more canisters with higher cap ratings are certified, but it cannot be implemented at present. Currently the user has no choice other than to use SCBA if the service life of a cap 1 canister is deemed to be too short.

P25 7(a) 1i

The second part of this paragraph is confusing since it discusses riot control agents, yet CBRN canisters are not specifically certified for CS and CN (it is possible to obtain a specific certification for CS and CN under 42CFR84) Clarification is required regarding the use of CBRN certified canisters against riot control agents. Does the fact that in the appendix A the OV TRA (cyclohexane) covers 61 agents including CS and CN mean a certified CBRN canister can be used against CS and CN in riot control emergencies that are not CBRN training-related?

7/20/2007

P25 7(a) 1k

Reference is made to the two canister ports on a CBRN mask, as well as a reference to hand-tightening the connector blank. Does this imply that a mask with two canister ports in which one port was blanked off with a blanking plate than can be attached or removed by hand can be CBRN certified? This appears to contradict the requirements of the CBRN APR standard April 2002.

P26 (2) a

It would be useful to provide links to sections that describe how accurate calculations can be made.

P26 (2) e

Suggest the word buddy instead of two-man so that female responders are included.

P26 (2) f

Suggest that recommending the words "all Clear" as examples when discussing voice commands that tell responders that a CBRN incident has been identified is not helpful. These words are more appropriate in the context of informing masked responders that there is no longer a hazard.

P27 (2) g

Suggest this example is rather fanciful and that the type of scenario described could be re-worded in a more business-like manner.

P27 (2) k

While it is recognized that NIOSH does not test the hydration devices during the CBRN certification process (although it could be argued that this is/could be done during the SMARTMAN tests) and therefore cannot recommend it be used in a contaminated environment, it would be useful to provide some guidance as to when NIOSH think that the hydration device could be used. Not being able to drink when in a contaminated environment seems to negate the purpose of the hydration device and therefore any point in including it in the CBRN APR standard.

P27\ (2) n

Typo:take "off" the.....

Randy Tomsa
Certification Engineer
Avon Protection Systems
Telephone: 231-779-6235
Fax: 231-779-6202
email: randy.tomsa@avon-rubber.com

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